

JOHN W. HUBER, United States Attorney (#7226)
CY H. CASTLE, Assistant United States Attorney (#4808)
PETER KUHN, Special Assistant United States Attorney (#3820)
Attorneys for the United States of America
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111-2176
Telephone: (801) 524-5682

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	Case No. 2:19-cr-00080 RJS
Plaintiff,	:	SECOND NOTIFICATION OF
v.	:	COMPLIANCE AND REQUEST FOR
	:	RECIPROCAL DISCOVERY
RALPH DAVID BRINTON,	:	
Defendant.	:	Judge Robert J. Shelby
	:	

The United States of America, by and through the undersigned, hereby files its second notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant.

The United States gives notice that the following is being or has been provided to counsel for defendant via United States Attorney File Exchange (USAFX):

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Description- Bates	File Name
RDB_00946 to RDB_01665	<ul style="list-style-type: none"> • {Folder} Audio – Transcripts • {Folder} Bankruptcy 14-32784 • {Folder} Bankruptcy 16-27945 • {Folder} Bankruptcy 17-23452 • Letter of Opinion Rick Blum File
Media Files:	 05-04-17 brinton.MP3  Brinton ch 13 11-21-16.MP3  Part 1 of meeting on 03-30-17.MP3  Part 2 of meeting on 03-30-17.MP3  Ralph Brinton 03-27-15.MP3

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect

and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use at trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 1st day of May, 2019.

JOHN W. HUBER
United States Attorney

/s/ Cy H. Castle
CY H. CASTLE
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing SECOND NOTIFICATION OF COMPLIANCE was made available to all parties named below, this 1st day of May, 2019.

Stephen G. Homer
2877 West 9150 South
West Jordan, UT 84088

/s/ *Ingrid Westphal-Kelson*
Paralegal Specialist